

1. Introduction

CNE OIL & GAS is committed to strict compliance with the legal regulation on anti-corruption, so that it complies with the provisions of Law 1778 of 2016 on Transnational Bribery, Resolution No. 100-002657 and Circular No. 100-000003 of the Superintendency of Companies.

Based on the commitment described above, CNE OIL & GAS designed and implemented an Ethics and Compliance Program, in order to prevent and manage the risk associated with corruption to which CNE OIL & GAS is exposed in the performance of its operations and activities.

2. General Policy

CNE OIL & GAS is committed to the fight against corruption and will therefore comply with the rules that apply to it.

CNE OIL & GAS rejects any unlawful activity or conduct involving corruption activities.

All operations, businesses and contracts carried out by CNE OIL & GAS will be in accordance with the policies and procedures established to prevent corruption and other internal rules governing the matter; otherwise, they will not be processed.

This policy and the company's guidelines regarding anti-corruption are of mandatory compliance, as well as all the related procedures, and it applies to all personnel working in CNE OIL & GAS, shareholders, customers, providers and other third parties linked to CNE OIL & GAS.

3. General Guidelines:

- CNE OIL & GAS employees, contractors, customers, agents and representatives must comply with the provisions of anti-corruption laws.
- CNE OIL & GAS prohibits any type of bribery in all places where it operates. In no event will any payment, gift or promise be made to any officer or employee or interested parties of any government or private entity so that their decisions, actions or omissions may benefit CNE OIL & GAS, or any employee thereof.
- If an employee or representative receives a request for a bribe or suspicious payment from any person or entity, this request must be immediately reported to the channels receiving reports.
- CNE OIL & GAS will conduct all the necessary investigations and analyses to determine if an act of corruption was committed, regardless of the position, office, relationship with CNE OIL & GAS or seniority of the persons allegedly linked to the fact.
- CNE OIL & GAS has committed itself to comply with all applicable laws in all the places where CNE OIL & GAS conducts its business. The employees and representatives of CNE OIL & GAS are required to know and comply with the content of this Manual.

4. Relevant Definitions:

Corruption can be defined as the will to act dishonestly in exchange for bribes or personal benefits, either directly or indirectly and unfairly favoring third parties against the interests of the company.

There are two types of corruption, depending on who gets the benefit from the act of corruption, which are:

- Private Corruption: When the benefit is for a natural person.
- Corporate Corruption: When the benefit is for a company/institution/foundation.

A bribe may consist in an offer, payment, promise of delivery in the future or request for anything of value such as money, gifts, information, employment, scholarships, discounts, total or partial payment of debts, entertainment, travel expenses, insurance, taxes or payments in general. It also includes any kind of benefits, whether goods or services in kind, in exchange for a particular advantage for a third party.

It is possible to become immersed in a bribery situation when a proposal to improperly benefit a third party is requested or accepted, in exchange for an immediate or future benefit.

A corruption event is the request or acceptance of a bribe by the direct officials of the CNE OIL & GAS or any person or entity representing it, such as suppliers, contractors, subcontractors, partners and their employees.

The following may be considered bribes, among others:

- Money, instruments or securities.
- Donations to charitable institutions.
- Payment of travel expenses.
- Job offer.
- Discounts.
- Payment of public or private services.
- Partial payments, total payment or forgiveness of debts.
- In-kind services.
- Gifts.
- Commissions and/or discounts.
- Scholarships.
- Entertainment.
- Payment of personal and/or professional services for the benefit of an employee or the employee's family members.
- Some gifts, presents and/or hospitality may be considered bribes depending on the context.

5. Measures against Corruption in Contracting:

Contracting is probably the process most vulnerable to acts of corruption. Therefore, a specific analysis is needed, including transparency as one of its main principles, and that is why it is important to establish examples of conduct that can be considered improper within it:

- Manipulation of information or conditions of need of the contract so that it be awarded to one or more third parties in particular.
- Purchases or contracting of services for amounts that are not adjusted to the actual market values.
- Leakage or manipulation of sensitive technical information for own or third-party benefit.
- Influence of the process of evaluation of offers or adjustment of results to favor one of the participants.
- Tampering of the selection process.
- Award of contracts in exchange for personal favors or benefits.
- Manipulation of technical information for own or third-party benefit.
- Influence conclusions of inspectors by concealing or manipulating information of the contract.
- Receive or request gifts or perks from suppliers.
- Request or receipt of any type of participation, profit or bribe from the contractor.
- Lack of control over changes that may occur during the performance of the contract.
- Manipulation of contract progress reports in order to expedite a payment.
- Payment of goods and/or services that have not been received or that do not meet the technical specifications.

6. Anti-Corruption Compliance Officer

CNE OIL & GAS has an Anti-Corruption Compliance Officer, appointed by the Board of Directors or the highest corporate body if there is no Board of Directors, who will be responsible for supervision of and compliance with anti-corruption regulation.

7. Contract Prevention Clause

CNE OIL & GAS contracts will contain standard clauses in relation to the anti-corruption mechanisms of the company.

This policy has been led by the Anti-Corruption Compliance Officer and has been subject to the relevant approval of the Board of Directors or the General Shareholders Meeting, as applicable.